



217/782-2113

OPERATING PERMIT - NESNAP SOURCES BENZENE

PERMITTEE

Nonsanto Company
Attention: J.H. Molloy
Route 3
Sauget, Illinois 62201

US EPA RECORDS CENTER REGION 5



491585

Application No.: 85060055

I.D. No.: 163121AAC

Applicant's Designation:

Date Received: December 12, 1986

Operating Permit Expiration Date: December 31, 1988

Subject: MONOCHLOROBENZENE

Date Issued: December 18, 1986

Location: Route 3, Sauget, Illinois

Permit is hereby granted to the above-designated Permittee to operate emission source(s) and/or air pollution control equipment consisting of Monochlorobenzene Plant as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This plant contain(s) sources in benzene service subject to National Emissions Standards for Hazardous Air Pollutants (NESNAP), 40 CFR 61, Subparts A, J and V, which are adopted as 35 Ill. Adm. Code 231. The Illinois EPA (IEPA) is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The Permittee shall comply with the applicable design and equipment standards, and marking, inspection, monitoring, tagging, repair and testing requirements in 40 CFR 61.242 or 61.243, and 61.246(b), for the following sources in benzene service, which are not in vacuum service:
 - i. Pumps (40 CFR 61.242-2)
 - ii. Compressors (40 CFR 61.242-3)
 - iii. Pressure relief devices in gas/vapor service (40 CFR 61.242-4)
 - iv. Sampling connection systems (40 CFR 61.242-5)
 - v. Open-ended valves or lines (40 CFR 61.242-6)
 - vi. Valves (40 CFR 61.242-7 or 61.243)
 - vii. Pressure relief devices in liquid service and flanges and other connectors (40 CFR 61.242-8)
 - viii. Product accumulator vessels (40 CFR 61.242-9), and
 - ix. Closed-vent systems and control devices (40 CFR 61.242-11).

~~CONFIDENTIAL~~



- c. If the Permittee decides to no longer comply with the alternative standards for valves in 40 CFR 61.243-1, and instead to comply with the work practice standards of 40 CFR 61.252-7(a)-(e), the IEPA shall be notified in writing at the address in Condition 5.
 - d. Delayed repair of leaks is allowed as provided in 40 CFR 61.242-10.
 - e. At all times the Permittee shall, to the extent practicable, maintain and operate sources in benzene service, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
2. The Permittee shall follow the procedures specified by 40 CFR 61.245 for inspections and compliance tests.
 - 3a. The permittee shall maintain records as required by 40 CFR 61.246, including:
 - i. Records on the detection, identity, and repair of all leaks (40 CFR 61.246(c))
 - ii. Records on the operation of each closed-vent system and control device (40 CFR 61.246(d))
 - iii. Records identifying all sources subject to 40 CFR 61.242 (40 CFR 61.246(e)), and
 - iv. Other records as are applicable to the operation of the plant.
 - b. These records shall be kept at a readily accessible location at the plant, and shall be available for inspection by the Agency.
 4. The Permittee shall submit semi-annual reports as required by 40 CFR 61.247(b) including:
 - i. Monthly data on leaks and repairs,
 - ii. Dates of process unit shutdowns,
 - iii. Revisions to the information submitted in previous reports, and
 - iv. Results of performance testing within the reporting period.
 5. Any required reports and notifications concerning operation, testing, or repairs shall be sent to the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

CONFIDENTIAL



Page 3

6. With the application for renewal of this permit, the permittee shall submit estimates of the annual emissions of total organic material and benzene from the sources included in this permit, and any revisions to hourly emission rates for individual sources.

Miles A. Zamco

Miles A. Zamco, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

MAZ:CPR:ds:4050H/56-58

cc: IEPA, FOS Region 3
IEPA, FOS - CMU
USEPA *hee*

12/19/82

CONFIDENTIAL



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

**STANDARD CONDITIONS
FOR
OPERATING PERMITS**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special permit condition(s).

1. The issuance of this permit does not release the permittee from compliance with state and federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or with applicable local laws, ordinances and regulations.
2. The Agency has issued this permit based upon the information submitted by the permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under 35 Ill. Adm. Code 201.207.
3.
 - a. The permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Agency and unless a new permit or revision of the existing permit(s) is issued for such modification.
 - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
4. The permittee shall allow any duly authorized agent of the Agency, upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities.

CALCULATION SHEET

Facility MONSANTO
 Anal. Eng. CPR Date 12 12 86
 Rev. Eng. _____ Date _____

I.D. 163 121 AAC
 PN 85 06 0055
 Date Rec. 12 05 86

RENEWAL OF OPERATING PERMIT FOR MONOCHLOROBENZENE PROCESS (NESHAP SOURCE)

PERMIT ISSUED APPROX 8-9 MONTHS AGO. NO SIGNIFICANT CHANGE IN OPERATION EXPECTED. APPLICATION CONFIRMS NO CHANGE.

MONSANTO HAS SUBMITTED REPORTS REQUIRED BY NESHAP. FOS INSPECTIONS REVEAL NO DIFFICULTY WITH THIS ASPECT OF OPERATION (RIGOROUS VERIFICATION OF COMPLIANCE W/NESHAP, WHICH IS FOR THE MOST PART PROCEDURAL, ONLY POSSIBLE BY FOS).

AS BENZENE, MONOCHLOROBENZENE, AND DICHLOROBENZENE ARE NOT PHOTOCHEMICALLY REACTIVE NO LIMITS APPLY UNDER §215.301 IN ANY EVENT. EMISSIONS \ll 8 LB/HOUR. EMISSION DATA PROVIDED IN 1/14/86 ANALYSIS BY JIM COBB.

CONDITION 6 OF PERMIT REQUIRED UPDATED EMISSION DATA. APPLICATION INDICATES ORIGINAL DATA STILL CURRENT.

grant permit
CPR 12/12/86

SAME CONDITIONS 1-5, LIST REQUIREMENTS CONDITIONS OF NESHAP REUSE CONDITION 6 TO INCLUDE ANNUAL DATA (CORRELATION OF EMISSIONS TO PRODUCTION) AND ANY REVISIONS TO EMISSION DATA.

CONFIDENTIAL

Monsanto

Monsanto Chemical Company
500 Monsanto Ave.
Sauget, Illinois 62206-1198
Phone: (618) 271-5835

December 1, 1986

CERTIFIED MAIL
#464077621
RETURN RECEIPT
REQUESTED

Mr. Bharat Mathur
Manager, Permit Section
Division of Air Pollution Control
Illinois EPA
Springfield, IL 62706

RE: 163121AAC

Dear Mr. Mathur:

Attached is an operating permit renewal application for the operation of the Monochlorobenzene Process at the W. G. Krummrich Plant.

Source Designation

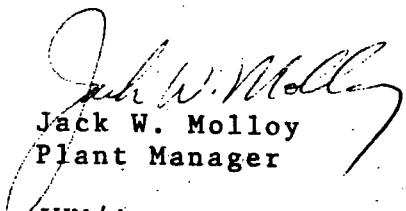
MCB

Application No.

85060055

The operation of this source has not been modified and estimated emissions remain unchanged since the last permit renewal period. The source is in full compliance with all Illinois Air Pollution Control Regulations and we therefore request renewal of this operating permit.

Sincerely yours,



Jack W. Molloy
Plant Manager

JWM/jc
Attachment

CONFIDENTIAL

SIGNATORY AUTHORIZATION
FOR PERMIT PROGRAM FORMS

J. W. Molloy, the Plant Manager of Monsanto Company's W. G. Krummrich Plant, Sauget, Illinois, is hereby authorized to sign permit applications, reports, and other documents required or requested by governmental environmental authorities.


R. G. Potter
Group Vice President
and Managing Director

Date: 11/1/55

~~CONFIDENTIAL~~



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 11X, Section 1039. Disclosure of this information is required under that section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center

APPLICATION FOR <u>RENEWAL</u> OF AN OPERATING PERMIT	FOR AGENCY USE ONLY
	I. D. NO. <u>163 121 AAC</u>
	PERMIT NO. <u>85 06 0055</u>
	DATE <u>12-5-86</u>
OPERATION OF: <u>MONOCHLOROBENZENE PROCESS</u> (A) (SAME AS 9c ON PAGE 2)	

1a. NAME OF OWNER: <u>Monsanto Company</u>		2a. NAME OF OPERATOR: <u>W. G. Krummrich Plant</u>	
1b. STREET ADDRESS OF OWNER: <u>800 N. Lindbergh</u>		2b. STREET ADDRESS OF OPERATOR: <u>500 Monsanto Ave.</u>	
1c. CITY OF OWNER: <u>St. Louis</u>		2c. CITY OF OPERATOR: <u>Sauget</u>	
1d. STATE OF OWNER: <u>Missouri</u>	1e. ZIP CODE: <u>63167</u>	2d. STATE OF OPERATOR: <u>Illinois</u>	2e. ZIP CODE: <u>62206-1198</u>

3a. NAME OF CORPORATE DIVISION OR PLANT: <u>W. G. Krummrich Plant</u>		3b. STREET ADDRESS OF EMISSION SOURCE: <u>500 Monsanto Ave.</u>	
3c. CITY OF EMISSION SOURCE: <u>Sauget</u>	3d. LOCATED WITHIN CITY LIMITS: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	3e. TOWNSHIP: <u>Centreville</u>	3f. COUNTY: <u>St. Clair</u>
		3g. ZIP CODE: <u>62206-1198</u>	

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) <u>Jack W. Molloy, Plant Manager</u>	5. TELEPHONE NUMBER FOR AGENCY TO CALL: <u>618-271-5835</u>
6. ADDRESS FOR CORRESPONDENCE: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION: (B) <u>M C B</u>

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S):

BY Jack W. Molloy 12/2/86
SIGNATURE DATE
Jack W. Molloy
TYPED OR PRINTED NAME OF SIGNER
Plant Manager
TITLE OF SIGNER

RECEIVED
BY DEC 5 1986
SIGNATURE DATE
IEPA - DAPC - SP-10
TYPED OR PRINTED NAME OF SIGNER
TITLE OF SIGNER

- (A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE OPERATED.
- (B) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.
- (C) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 103(a)(4) OR 103(b)(5) WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

COPY